

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

TRUE VALUE COMPANY, L.L.C., et al.,

Debtors.¹

Chapter 11

Case No. 24-12337 (KBO)

(Jointly Administered)

Related Docket No. _____

**ORDER SUSTAINING DEBTORS' THIRD OMNIBUS OBJECTION TO CLAIMS
(NON-SUBSTANTIVE)**

Upon consideration of the objection (the “Objection”)² of the Debtors for entry of an order (this “Order”) disallowing and expunging the Disputed Claims set forth on **Schedule 1**, **Schedule 2**, and **Schedule 3** attached hereto; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and this Court having found that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Objection has been given under the particular circumstances; and it appearing that no other or further notice is necessary; and this Court having reviewed the Objection; and upon the record of the

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: True Value Company, L.L.C. (9896); TV Holdco II, L.L.C. (2272); TV TSLC, L.L.C. (7025); TV GPMC, L.L.C. (8136); True Value Retail, L.L.C. (7946); TrueValue.com Company, L.L.C. (6386); True Value Virginia, L.L.C. (9197); and Distributors Hardware, L.L.C. (8106). The address of the Debtors’ corporate headquarters is 8600 W. Bryn Mawr Ave. Chicago, IL 60631.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

Chapter 11 Cases; and this Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Any Response to the Objection not otherwise withdrawn, resolved, or adjourned is hereby overruled on its merits.
3. The Late Filed Claims identified on **Schedule 1** attached hereto are disallowed and expunged in their entirety.
4. The Duplicate Claims identified on **Schedule 2** attached hereto are disallowed and expunged in their entirety.
5. The Amended Claims identified on **Schedule 3** attached hereto are disallowed and expunged in their entirety.
6. This Order shall be deemed a separate order with respect to each of the Disputed Claims identified on **Schedule 1**, **Schedule 2**, and **Schedule 3** attached hereto. Any stay of this Order pending appeal by any of the claimants whose Disputed Claim(s) are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability or finality of this Order with respect to the other contested matters listed in the Objection or this Order.
7. The Debtors and Omni are authorized to take all actions necessary and appropriate to give effect to this Order.

8. Omni is authorized to modify the Claims Register to comport with the relief granted by this Order.

9. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

10. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any claim against the Debtors; (b) as a waiver of the Debtors' rights to dispute or otherwise object to any claim on any grounds or basis; (c) to waive or release any right, claim, defense, or counterclaim of the Debtors, or to estop the Debtors from asserting any right, claim, defense, or counterclaim; (d) as an approval or assumption of any agreement, contract, or lease, pursuant to section 365 of the Bankruptcy Code; or (e) as an admission that any obligation is entitled to administrative expense priority or any such contract or agreement is executory or unexpired for purposes of section 365 of the Bankruptcy Code or otherwise.

11. The terms and conditions of this Order shall be immediately enforceable and effective upon its entry.

12. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

SCHEDULE 1

Late Filed Claims

Schedule 1

TRUE VALUE COMPANY, L.L.C., et. al.
 Claim Objections - Late Filed Claims

No.	Name of Claimant	Filed Date	Claim Number	Claim Type	Claim Amount	Reason for Disallowance
1.	Wentzel's True value-Theodore W Wentzel	12/28/2024	C337-100353	Admin	\$14,059.15	The Disputed Claim listed was filed after the established Administrative Bar Date of 12/23/2024.
2.	Yeager Hardware	12/24/2024	C337-100348	Admin	\$7,587.71	The Disputed Claim listed was filed after the established Administrative Bar Date of 12/23/2024.
3.	Zurn Water, LLC	12/27/2024	C337-2726	503(b)(9)	\$5,991.36	The Disputed Claim listed was filed after the established 503(b)(9) Bar Date of 11/27/24.

SCHEDULE 2

Duplicate Claims

Schedule 2

TRUE VALUE COMPANY, L.L.C., et. al.

Claim Objections - Duplicate Claims

No.	Name of Claimant	Remaining Claim	Duplicative Claim to Be Disallowed	Claim Amount	Reason for Disallowance
1.	American Wood Fibers	C337-683	C337-524	\$463,325.62	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
2.	Amerock, LLC	C337-100186	C337-100188	\$1,238.68	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
3.	B&K LLC d/b/a BK Products	C337-2525	C337-2527	\$1,408,394.22	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
4.	CIT Bank, N.A., a division of First Citizens Bank & Trust Company	C337-100337	C337-100338	\$98,926.04	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
5.	Clean Earth Environmental Solutions, Inc.	C337-100025	C337-100026	\$4,561.83	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
6.	CMT USA, Inc	C337-537	C337-422	\$154,634.35	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
7.	Compass Health Brands Corp	C337-381	C337-400	\$28,206.15	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
8.	Compass Health Brands Corp	C337-381	C337-383	\$28,206.15	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
9.	CorVel Enterprise Comp, Inc.	C337-100076	C337-100081	\$20,518.87	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
10.	CorVel Enterprise Comp, Inc.	C337-100076	C337-100082	\$20,518.87	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
11.	CorVel Enterprise Comp, Inc.	C337-100076	C337-100077	\$20,518.87	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
12.	CorVel Enterprise Comp, Inc.	C337-100076	C337-100078	\$20,518.87	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
13.	CorVel Enterprise Comp, Inc.	C337-100076	C337-100079	\$20,518.87	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
14.	DAP Global, Inc	C337-1912	C337-1959	\$370,530.05	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim." The Remaining Claim is listed on the Reduce & Allow schedule included in the Substantive Objections.
15.	DAP Global, Inc.	C337-1912	C337-1628	\$370,530.05	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim." The Remaining Claim is listed on the Reduce & Allow schedule included in the Substantive Objections.
16.	Elkay Sales, LLC	C337-1919	C337-1668	\$382,595.04	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
17.	eStyle Caps and Closures, Inc.	C337-1465	C337-2414	\$13,118.56	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
18.	Generac Power Systems, Inc	C337-1823	C337-1971	\$1,767,377.50	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim." The Remaining Claim is listed on the Reduce & Allow schedule included in the Substantive Objections.
19.	Generac Power Systems, Inc.	C337-1823	C337-1661	\$1,767,377.50	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim." The Remaining Claim is listed on the Reduce & Allow schedule included in the Substantive Objections.
20.	Hanmi Bank	C337-100340	C337-100342	\$10,642.18	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
21.	Haulotte US, Inc	C337-1718	C337-1651	\$652,502.59	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
22.	International Forest Products LLC	C337-100343	C337-100347	\$803,929.45	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
23.	J Kinderman and Sons	C337-1762	C337-1139	\$2,771.22	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
24.	JELD-WEN, Inc.	C337-100300	C337-100302	\$52,101.32	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
25.	KAB Enterprise Co., Ltd.	C337-100212	C337-100226	\$105,323.55	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
26.	Lifetime Brands Inc	C337-119	C337-121	\$297,264.58	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
27.	Nuvik USA, Inc	C337-640	C337-606	\$32,685.98	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."

TRUE VALUE COMPANY, L.L.C., et. al.

Claim Objections - Duplicate Claims

No.	Name of Claimant	Remaining Claim	Duplicative Claim to Be Disallowed	Claim Amount	Reason for Disallowance
28.	Perfection Floor Tile, LLC (61519)	C337-100028	C337-100035	\$17,688.42	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
29.	Raymond West Intralogistics Solutions	C337-100237	C337-100238	\$6,826.61	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
30.	Rhino Environmental, LLC	C337-100056	C337-100057	\$37,641.10	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
31.	Ricoh USA, Inc.	C337-100260	C337-100261	\$16,540.73	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
32.	Rust-Oleum Corporation	C337-1623	C337-1960	\$685,312.58	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
33.	Rust-Oleum Corporation	C337-1623	C337-1904	\$685,312.58	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
34.	Ryder Integrated Logistics, Inc.	C337-100254	C337-100256	\$3,235,409.92	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
35.	Saint-Gobain Abrasives, Inc.	C337-100009	C337-100012	\$5,825.40	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
36.	Schumacher Electric Corporation	C337-100120	C337-100123	\$69,735.11	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
37.	Service Tool Company LLC	C337-314	C337-318	\$211,998.13	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
38.	Somerset Leasing Corp. XXII	C337-100289	C337-100291	\$13,613.85	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
39.	Somerset Leasing Corp. XXII	C337-100289	C337-100292	\$13,613.85	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
40.	Southwire Company LLC	C337-1723	C337-2016	\$398,632.08	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim." The Remaining Claim is listed on the Reduce & Allow schedule included in the Substantive Objections.
41.	Uline	C337-1845	C337-1638	\$19,242.65	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
42.	US Salt, LLC	C337-100075	C337-100080	\$43,166.97	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
43.	Virginia Abrasives Corp.	C337-1902	C337-1566	\$247,397.03	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
44.	Whirlpool Corporation	C337-1820	C337-1468	\$384,501.41	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
45.	Winnsboro Builders True Value #16041	C337-100040	C337-100041	\$24,600.38	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
46.	Winnsboro Builders True Value #16041	C337-100040	C337-100042	\$24,600.38	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
47.	Wiremasters, Incorporated	C337-100171	C337-100177	\$96,807.00	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
48.	Zippo Manufacturing Company	C337-100245	C337-100246	\$23,503.56	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
49.	Zippo Manufacturing Company	C337-100245	C337-100247	\$23,503.56	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
50.	Zippo Manufacturing Company	C337-100245	C337-100248	\$23,503.56	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
51.	Zippo Manufacturing Company	C337-100245	C337-100249	\$23,503.56	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
52.	Zippo Manufacturing Company	C337-100245	C337-100250	\$23,503.56	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
53.	Zippo Manufacturing Company	C337-100245	C337-100251	\$23,503.56	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
54.	Zurn PEX, Inc	C337-1828	C337-1964	\$34,517.01	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."
55.	Zurn PEX, Inc.	C337-1828	C337-1666	\$34,517.01	The Disputed Claim listed is duplicative of the Claim listed under "Remaining Claim."

SCHEDULE 3

Amended Claims

Schedule 3

TRUE VALUE COMPANY, L.L.C., et. al.

Claim Objections - Amended Claims

No.	Name of Claimant	Remaining Claim	Amended Claim to Be Disallowed	Remaining Claim Amount	Reason for Disallowance
1.	3M Company	C337-2461	C337-1080	\$427,466.53	Claim No.C337-1080 was amended and superseded by Claim No.C337-2461.
2.	AA Window Parts & Hardware	C337-2296	C337-2281	\$16,742.55	Claim No.C337-2281 was amended and superseded by Claim No.C337-2296.
3.	American Wholesale Corporation	C337-2167	C337-2163	\$9,582.89	Claim No.C337-2163 was amended and superseded by Claim No.C337-2167.
4.	B&K LLC d/b/a BK Products	C337-2525	C337-932	\$1,408,394.22	Claim No.C337-932 was amended and superseded by Claim No.C337-2525.
5.	Behr Process LLC	C337-2238	C337-1555	\$622,438.48	Claim No.C337-1555 was amended and superseded by Claim No.C337-2238.
6.	Big Rock Sports, LLC	C337-1443	C337-1442	\$948,980.99	Claim No.C337-1442 was amended and superseded by Claim No.C337-1443.
7.	Big Rock Sports, LLC	C337-1481	C337-1443	\$948,980.99	Claim No.C337-1443 was amended and superseded by Claim No.C337-1481.
8.	BlueLinx Corporation	C337-1935	C337-1932	\$430,726.79	Claim No.C337-1932 was amended and superseded by Claim No.C337-1935.
9.	BlueLinx Corporation	C337-1945	C337-1935	\$430,726.79	Claim No.C337-1935 was amended and superseded by Claim No.C337-1945.
10.	BlueLinx Corporation	C337-1946	C337-1945	\$430,726.79	Claim No.C337-1945 was amended and superseded by Claim No.C337-1946. The Remaining Claim is listed on the No Liability schedule included in the Substantive Objections.
11.	BlueLinx Corporation	C337-1786	C337-1784	\$430,726.79	Claim No.C337-1784 was amended and superseded by Claim No.C337-1786.
12.	BlueLinx Corporation	C337-1932	C337-1786	\$430,726.79	Claim No.C337-1786 was amended and superseded by Claim No.C337-1932.
13.	BrassCraft Manufacturing Company	C337-2237	C337-1554	\$421,257.76	Claim No.C337-1554 was amended and superseded by Claim No.C337-2237.
14.	Broan Nutone LLC	C337-2623	C337-2621	\$37,402.60	Claim No.C337-2621 was amended and superseded by Claim No.C337-2623. The Remaining Claim is listed on the Reduce & Allow schedule included in the Substantive Objections.
15.	Broan-Nutone LLC	C337-2621	C337-596	\$37,402.60	Claim No.C337-596 was amended and superseded by Claim No.C337-2621.
16.	Char-Broil, LLC	C337-1852	C337-1835	\$145,541.11	Claim No.C337-1835 was amended and superseded by Claim No.C337-1852.
17.	Cross Manufacturing, Inc.	C337-1616	C337-570	\$1,686.60	Claim No.C337-570 was amended and superseded by Claim No.C337-1616.
18.	Delta Faucet Company	C337-2239	C337-1556	\$453,394.21	Claim No.C337-1556 was amended and superseded by Claim No.C337-2239.
19.	Franklin Sports, Inc.	C337-1862	C337-319	\$60,248.68	Claim No.C337-319 was amended and superseded by Claim No.C337-1862.
20.	Franklin Sports, Inc.	C337-1868	C337-1862	\$60,248.68	Claim No.C337-1862 was amended and superseded by Claim No.C337-1868.
21.	Gardner-Gibson Inc. (ICP Group)	C337-2367	C337-1905	\$812,104.14	Claim No.C337-1905 filed by ICP Group was amended and superseded by Claim No.C337-2367 filed by Gardner-Gibson Inc.
22.	Great Northern Equipment Distributing, Inc	C337-1780	C337-12	\$171,885.32	Claim No.C337-12 was amended and superseded by Claim No.C337-1780.
23.	Huber Engineering Woods LLC	C337-1814	C337-1381	\$289,466.20	Claim No.C337-1381 was amended and superseded by Claim No.C337-1814.
24.	ICP Group	C337-1905	C337-1844	\$676,715.03	Claim No.C337-1844 was amended and superseded by Claim No.C337-1905.
25.	ITM Co. Ltd.	C337-1624	C337-1622	\$400,960.03	Claim No.C337-1622 was amended and superseded by Claim No.C337-1624.
26.	JPW Industries, Inc.	C337-2338	C337-2328	\$183,768.12	Claim No.C337-2328 was amended and superseded by Claim No.C337-2338.
27.	Mansfield Oil Company	C337-2448	C337-1317	\$104,305.57	Claim No.C337-1317 was amended and superseded by Claim No.C337-2448.

TRUE VALUE COMPANY, L.L.C., et. al.

Claim Objections - Amended Claims

No.	Name of Claimant	Remaining Claim	Amended Claim to Be Disallowed	Remaining Claim Amount	Reason for Disallowance
28.	Melnor Inc	C337-1103	C337-894	\$1,358,644.35	Claim No.C337-894 was amended and superseded by Claim No.C337-1103. The Remaining Claim is listed on the Reduce & Allow schedule included in the Substantive Objections.
29.	Missouri Department of Revenue	C337-1742	C337-1477	\$1,682.32	Claim No.C337-1477 was amended and superseded by Claim No.C337-1742.
30.	Moda at Home Enterprises Ltd	C337-18	C337-13	\$170,098.71	Claim No.C337-13 was amended and superseded by Claim No.C337-18.
31.	Omya Inc.	C337-2091	C337-2077	\$16,380.00	Claim No.C337-2077 was amended and superseded by Claim No.C337-2091.
32.	Rust-Oleum Corporation	C337-1623	C337-1621	\$685,312.58	Claim No.C337-1621 was amended and superseded by Claim No.C337-1623.
33.	Silgan Dispensing Systems Corporation	C337-2286	C337-1857	\$2,534.41	Claim No.C337-1857 was amended and superseded by Claim No.C337-2286.
34.	Teknor Apex Company	C337-926	C337-838	\$1,243,824.83	Claim No.C337-838 was amended and superseded by Claim No.C337-926.
35.	Tigre USA Inc.	C337-1645	C337-1641	\$431,401.84	Claim No.C337-1641 was amended and superseded by Claim No.C337-1645.
36.	VP Racing Fuels	C337-1041	C337-842	\$410,284.65	Claim No.C337-842 was amended and superseded by Claim No.C337-1041.
37.	VP Racing Fuels	C337-1041	C337-1154	\$410,284.65	Claim No.C337-1154 was amended and superseded by Claim No.C337-1041.
38.	Watts Water Technologies, Inc.	C337-2528	C337-1291	\$211,856.78	Claim No.C337-1291 was amended and superseded by Claim No.C337-2528.